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Attorneys for Defendants  
CHICAGO TITLE INSURANCE COMPANY

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

THE BANK OF NEW YORK MELLON  
TRUST COMPANY, NATIONAL  
ASSOCIATION FKA THE BANK OF NEW  
YORK TRUST COMPANY, N.A. AS  
SUCCESSOR TO JP MORGAN CHASE  
BANK N.A., AS TRUSTEE FOR RAMP  
2005-RS8,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC., et al.,

Defendants.

Case No.: 2:20-cv-01373-APG-DJA

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

**(First Request)**

Plaintiff The Bank of New York Mellon Trust Company, National Association FKA The Bank of New York Trust Company, N.A. as successor to JP Morgan Chase Bank N.A., as trustee for RAMP 2005-RS8 ("BONY"), and Defendant Chicago Title Insurance Company ("Chicago Title"), by and through their respective attorneys of record, hereby agree and stipulate as follows.

1. On July 24, 2020, BONY filed its complaint in this action [ECF No. 1];
2. On August 3, 2020 BONY served its complaint on Chicago Title, Fidelity National Title Group, Inc. ("FNTG"), and Ticor Title of Nevada, Inc. ("Ticor Agency") (collectively, "Defendants") (ECF Nos. 5, 6, 7.);



3. Defendants' respective responses to BONY's complaint are currently due on August 24, 2020;

4. Counsel for Defendants is requesting a 30-day extension until September 23, 2020 for Defendants to file their respective responses to BONY's complaint to accommodate various scheduling conflicts for Defendants' counsel and to afford Defendants' counsel additional time to review and respond to BONY's complaint;

5. Counsel for BONY does not oppose the extension;

6. This is the first request for an extension made by counsel for Defendants which is made in good faith and not for the purposes of delay.

7. This stipulation is entered into without waiver of any of Defendants' objections pursuant to Fed. R. Civ. P. 12.

**IT IS SO STIPULATED** that Chicago Title, FNTG, and Ticor Agency's responses to BONY's complaint shall be due on Wednesday, September 23, 2020.

DATED this 20th day of August, 2020.	DATED this 20th day of August, 2020.
WRIGHT, FINLAY & ZAK, LLP	EARLY SULLIVAN WRIGHT GIZER & McRAE LLP
<u>/s/--Lindsay D. Robbins</u> Lindsay D. Robbins, Esq. Nevada Bar No. 13474 7785 W. Sahara Ave., Suite 200 Las Vegas, NV 89117 <i>Attorneys for Plaintiff, Bank of New York Mellon Trust Company, National Association FKA The Bank of New York Trust Company, N.A. as successor to JP Morgan Chase Bank N.A., as trustee for RAMP 2005-RS8</i>	<u>/s/-Kevin S. Sinclair</u> Kevin S. Sinclair, Esq. Nevada bar No. 12277 Sophia S. Lau, Esq., Nevada Bar No. 13365 8716 Spanish Ridge Avenue, Suite 105 Las Vegas, Nevada 89148 <i>Attorneys for Defendant, Chicago Title Insurance Company</i>

**IT IS SO ORDERED.**

DATED this 21st day of August, 2020.

  
UNITED STATES MAGISTRATE JUDGE

